



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103-2029



ORIGINAL

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

December 16, 1998

TO: De minimis Parties Listed in Attachment "A"

RE: Malvern TCE Superfund Site  
De Minimis Settlement Offer

Dear De Minimis Parties:

This letter constitutes the final de minimis settlement offer issued by the United States Environmental Protection Agency ("EPA") with regard to the Malvern TCE Superfund Site ("Site"). A list of those potentially responsible parties ("PRPs") for the Site that are eligible to participate in this de minimis settlement is enclosed (Attachment "A").

Due to the relatively small amount of hazardous materials that your company contributed to the Site, EPA is offering your company an opportunity to settle as a de minimis party. As a de minimis party, in return for a specified cash payment, EPA will agree not to sue or take any other civil or administrative action against your company with regard to the Malvern TCE Site.

The terms of this final de minimis settlement offer are set forth in the Final Administrative Order on Consent for De Minimis Settlement ("Final Consent Order") (Attachment "B"). Information describing the volume of waste attributed to each PRP and the projected total payment due under the terms of the settlement is set forth in Generator and Broker/Transporter Volumetric Ranking Summaries dated November 30, 1998 ("November 1998 VRS"). The November 1998 VRS are attached to the Final Consent Order as Appendix "C."

I. Settlement Background

This final de minimis settlement offers follows a letter dated April 30, 1998, in which EPA notified PRPs for the Site of the opportunity to participate in a de minimis settlement. With that letter, EPA enclosed a Draft Administrative Order by Consent ("Draft Consent Order") setting forth the terms by which PRPs that are eligible for this de minimis settlement, pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), as amended, 42 U.S.C. § 9601, et seq., could conclude their liability to the United States for response costs incurred or to be incurred at the Site. Also enclosed in EPA's April 30, 1998 letter, were Generator and Broker/Transporter Volumetric Ranking Summaries dated April 27, 1998 ("April 1998 VRS"), which listed the volume of waste attributed to each PRP and projected total payment due under the terms of the settlement embodied in the Draft Consent Order.

Customer Service Hotline: 1-800-438-2474

Subsequent to the mailing of the Draft Consent Order, EPA met with representatives of a Site De Minimis PRP Group, responded to numerous telephone calls from PRPs or their attorneys, and received and considered comments submitted by a number of PRPs with respect to the proposed settlement in general and specific terms set forth in the Draft Consent Order.

EPA's response to the comments received from these various sources is reflected in the enclosed Final Consent Order, which modifies some important and substantive terms of the Draft Consent Order.

Subsequent to the mailing of its April 30, 1998 letter, EPA also revised the April 1998 VRS in order to reflect changes required as a result of: 1) recently discovered data inputting errors that appeared in the April 1998 VRS<sup>1</sup>; 2) review and/or reconsideration of PRP challenges that had been submitted by PRPs (during the challenge periods provided by EPA) to prior draft volumetric summaries, including the April 1998 VRS; and 3) identification of additional broker/transporter transactions relating to the Site.

## II. Summary of Settlement Offer in this Final Consent Order

### A. Eligibility

The eligibility criteria remain unchanged. Small waste contributors eligible for de minimis settlement have been identified by EPA by utilizing information set forth in the November 1998 Summaries. A PRP is eligible to participate in this settlement if its volumetric contribution of hazardous substance to the Site is at or less than .75% of the total volume attributed to the Main Plant Area ("MPA") of the Site, as set forth in the November 1998 Summaries.<sup>2</sup> Generator PRPs should refer to the "MPA %" column contained in the Generator VRS in order to determine their MPA %. Broker/transporter PRPs should add their MPA % listed on both the Generator VRS and the Broker/Transporter VRS, in order to determine their total MPA %.<sup>3</sup>

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<sup>1</sup> During EPA's review of the April 1998 VRS prior to this mailing, a number of data entry errors were detected and corrected. These corrections led to a decrease in drum counts for a number of PRPs. As a result, most parties listed in the August 1998 VRS will have an increase in volume due to the decrease in total drums transported to the Site.

<sup>2</sup> EPA has established a de micromis cutoff at 1.5 drums or less. At present, EPA does not foresee a need to pursue settlements with de micromis parties. EPA will, however, pursue settlements with de micromis parties if there is a threat of, or an actual suit by, other PRPs at the Site.

<sup>3</sup> Please refer to the documents entitled "Malvern TCE Volumetric Ranking Summaries Overview and Methodology" and "VRS Explanation Sheet" (Attachment "C"), for a

In signing the Final Consent Order, each De Minimis Respondent will certify that the company it represents qualifies for the de minimis settlement eligibility terms (See Final Consent Order, Section X, Certification). Please note that under the terms of the settlement, the United States may void the agreement with respect to any individual party if, among other things, a De Minimis Respondent contributed more than .75% of the total volume attributed to the MPA, or if the certification provided by the De Minimis Respondent is false or materially inaccurate.

Please note that this may be the only de minimis settlement offer that EPA will make in this case. You should be aware that if you do not join in the de minimis settlement, you may continue to be potentially liable to EPA and/or for contribution to other parties at the Site.

B. Amount of Cash Payment

The Final Consent Order establishes a total payment each eligible PRP must pay to settle its liability to the United States. This total payment is reflected in the "Total De Minimis Payment" column provided in the November 1998 VRS. The total payment consists of the following costs relating to the Site:

- (1) a payment amount for past costs incurred by EPA;
- (2) a payment for estimated future costs; and
- (3) a premium added to the estimated future costs.

The payment amounts provided in the November 1998 VRS are based on calculations of estimated costs for cleanup of the Site. For purposes of the de minimis settlement, total future response costs are based on estimates set forth in the Record of Decision issued by EPA in November 1997 for the Site.

C. Installment Payments

In response to comments received from PRPs to the Draft Consent Order, EPA has included in its cost estimates only remedial, not removal, oversight costs. Remedial oversight costs are estimated to be \$200,000.00. This reduction in oversight costs included in the costs estimates is consistent with the decision by the Third Circuit Court of Appeals in United States v. Rohm and Haas, 2 F.3d 1265 (3d Cir. 1993).

EPA has been asked by PRPs to consider installment payments in order to encourage participation in this de minimis settlement by those parties that are willing to enter into a settlement but would be unable to participate unless given an opportunity to make payments over a longer period of time. In response to these requests, EPA has provided in the Final Consent Order an installment payment option pursuant to which a party may pay its de

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more detailed description of the methodology utilized and information contained in the November 1998 VRS.

minimis settlement payment in two equal installments. The first installment will be due within thirty (30) calendar days of the effective date of the Consent Order, and the balance will be due within one year of the effective date of the Consent Order.

D. Failure to Make Payment

Please note that pursuant to Section IX of the Consent Order, if any De Minimis Respondent fails to make payment within thirty (30) calendar days of the payment becoming due, the Consent Order shall be terminated as to that De Minimis Respondent. Late payments (those paid after the due date but within thirty (30) calendar days of the payment becoming due), shall accrue interest, which shall be assessed to such De Minimis Respondent.

E. Covenant Not to Sue

In return for the cash payment specified in the November 1998 VRS, EPA will provide the Covenant Not to Sue as set forth in Section XI, Paragraph 26, of the Final Consent Order. The settlement also provides protection against contribution actions that could be brought against De Minimis Respondents concerning the Site, to the extent provided in Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(g)(5).

F. Form of the Settlement

This settlement offer is being made only to the addressees of this letter, for a limited period of time. Should you wish to accept this settlement offer, you must do so in accordance with the terms provided in the Final Consent Order. Following the period that you have for joining the settlement, EPA will initiate a thirty (30) day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i). At the completion of the comment period, EPA will execute the agreement, unless it modifies or withdraws its consent pursuant to Sections XVI and XVII of the Consent Order.

G. Required Actions for Participation in this Settlement

(1) Deadline for Submission of Signature Pages

In order to join this settlement, you must execute and submit to EPA a signed signature page to the enclosed Consent Order by January 29, 1999.<sup>4</sup> **DO NOT SEND ANY SETTLEMENT PAYMENT AT THAT TIME.**

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<sup>4</sup> De Minimis PRPs that have raised ability to pay concerns with EPA may defer indicating their acceptance of this offer until after EPA has reviewed and analyzed these parties' financial claims.

(2) Contact Person

Please forward your signature pages to:

Joan A. Johnson (3RC41)  
Assistant Regional Counsel  
United States Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

(3) Deadline for Payment and Mechanics of Payment

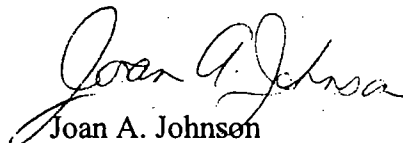
Sometime after January 29, 1999, EPA will notify those parties that have executed and submitted their signature pages in a timely manner of the effective date of the Final Consent Order (refer to Section XIX, Paragraph 40, Effective Date). You will then have thirty (30) days from EPA's issuance of notice of the effective date to make the payment required by the Final Consent Order. **Do not send a payment until the EPA notifies you that the Final Consent Order is effective.**

If you have any questions about the terms of the Final Consent Order or with respect to information relating to your company as set forth in the November 1998 VRS, please direct your inquiries to:

Joan A. Johnson (3RC41)  
Assistant Regional Counsel  
United States Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Please be advised that this letter is sent for informational purposes only and cannot substitute for a careful review of the Final Consent Order.

Sincerely,

A handwritten signature in cursive script, appearing to read "Joan A. Johnson".

Joan A. Johnson  
Assistant Regional Counsel

- Attachment A - List of De Minimis Parties
- Attachment B - Final Administrative Order on Consent for De Minimis Parties
- Attachment C - Volumetric Ranking Summaries Overview and Methodology  
Volumetric Ranking Summaries Challenges and EPA Response
- Attachment D - Comprehensive Mailing List (All Site PRPs)

## **Attachment A**

### **List of *De Minimis* Parties**

\*\* A I W Frank

Acro Labels  
Mr. Bob Reagan, President  
2531 Wyandotte Road  
Willow Grove, PA 19090

A & J Screw Machine Products  
Mr. Joseph A. Harmer  
32 Hamilton Street  
P.O. Box 278  
Chalfont, PA 18914-2804

\*\* ADEC

A & J Screw Machine Products  
Mr. Joseph A. Harmer  
24 Hillside Avenue  
Chalfont, PA 18914-2804

Adelphia Graphic Systems (AGS)  
Ms. Paula Inforzato, Vice President  
302 Commerce Drive  
Exton, PA 19341

A. Johnson & Company Incorporated  
President  
215 Welsh Pool Road  
Lionville, PA 19353

\*\* Aero Plating

A & L Handles  
Mr. Philip K. Stonier, Vice President  
244 Shoemaker Road  
Pottstown, PA 19464

\*\* Agitar, Div. of Air Buensod Incorporated

Accumetrics  
Mr. Paul Pitcher, President  
134 Adams Street  
Royersford, PA 19468

Airline Hydraulics Corporation  
Mr. Joseph Laughran, President  
I-95 & Street Road  
Bensalem, PA 19020

\* Accuracy Scientific

Airworks  
c/o General Electric  
Kirk R. McFarlane, Esq.  
640 Freedom Business Center  
King of Prussia, PA 19406

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.



Airworks  
c/o UNC Airworks  
Ted Coyle, Esq.  
101 East Orden Boulevard  
Millville, NJ 08332

AMF Incorporated  
c/o Minstar Incorporated  
Ms. Mary McConnell, Vice President  
100 South 5th Street, Suite 2400  
Minneapolis, MN 55452

Alfa-Laval Separation Incorporated  
c/o Tetra-Laval  
Mr. Quinton Jackson, President  
9201 Wilnot Road  
P.O. Box 840  
Kenosha, WI 53141

AMP Corporation  
Mr. William Hudson, President  
P.O. Box 3608  
Harrisburg, PA 17105

Allister Manufacturing  
c/o Allstar Manufacturing  
President  
311 Willowbrook Lane  
West Chester, PA 19383

Amuneal Manufacturing Company  
Mr. Larry Maltin, President  
4737 Darrah Street  
Philadelphia, PA 19124-2705

Amchem  
c/o Henkel Corporation  
Ken Arnold, Esq.  
49 Valley Drive  
Furlong, PA 18925

Anchor Darling Company  
Mr. Brian McGarvey, President  
7 East Wynnewood Road  
Wynnewood, PA 19096

American Electronics Laboratories  
c/o AEL Industries  
Patrick S. Till  
Environmental/Safety Engineer  
105 Richardson Road  
Lansdale, PA 19446-1485

Angelo  
c/o Angelo Brothers Company  
Barton A. Pasternak, Esq.  
Vice President & General Counsel  
12401 McNulty Road  
Philadelphia, PA 19154-1099

Ames Supply

Ark Products  
Mr. Ronald A. King  
Vice President  
3320 Willow Street Pike South  
Willow Street, PA 17584

Artek Incorporated  
Mr. Thomas A. Deeney  
Director of Corporate Compliance  
Market Square  
Pottsville, PA 19301

\* Artco

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

Asplundh Manufacturing Company  
Mr. Carl Asplundh, President  
708 Blair Mill Road  
Willow Grove, PA 19090

Berg Laboratories  
President  
130-C Harding Avenue  
Bellmawr, NJ 08031

\*\* Aston-Hill Company

Biddle Instruments Company  
c/o Aval International  
Mr. Tom Evans, President  
510 Township Line Road  
Blue Bell, PA 19422

Athena Controls  
c/o Inductotherm Industries Incorporated  
J. D. Visco  
10 Indel Avenue  
Rancocas, NJ 08073

Bilgram Gear Company  
Mr. David Winther, President  
8 Union Hill Road  
West Conshohocken, PA 19428

\* Auto Pack

\* Bishop Tube Company

B.P. Oil  
Ms. Cheryl A. Foerstner  
Law Department  
200 Public Square  
11-3454-C  
Cleveland, OH 44114-2375

Bo Peep Cleaners  
President  
18 Doylestown Shopping Center  
Doylestown, PA 18901

Beemer Engineering  
c/o Beemer Precision Company Incorporated  
Mr. H. Meyers, President  
30 New York Drive  
Port Washington, PA 19034

Boeing  
c/o Boeing Company  
President  
Route 291 & Industrial Parkway  
Ridley Park, PA 19078

Endtru Company  
c/o Powers Equipment Company Incorporated  
Mr. E. Robert Powers, CEO  
10 Jacksonville Road  
Athboro, PA 19040

Boekel Industries  
Mr. Al Bush, President  
855 Pennsylvania Avenue  
Feasterville, PA 19053

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

\* Boyertown Packing Company

C.K. Systematics Incorporated  
c/o Systematics Incorporated  
Mr. James L. Conley, CEO  
1025 Saunders Lane  
West Chester, PA 19380

Brandt Corporation  
c/o Lefebure  
Mr. Joel Patton, President  
308 29th Street NE  
Cedar Rapids, IA 52460

Camdel Metals  
Mr. Millard Vaughn, Plant Manager  
Drawer H  
Revco Industrial Park  
Camden, DE 19934

\*\* Brittany's Ltd.

Cantol Incorporated  
Mr. Elmer E. Snethen  
Executive Vice President  
2211 North American Street  
Philadelphia, PA 19153

Brooks Instrument  
Mr. Robert Heffernan, President  
407 West Vine Street  
Hatfield, PA 19440

Carvel Hall Incorporated  
c/o Syrattech Incorporated  
Mr. Leonard Florence, President  
175 McClellan Highway  
East Boston, MA 02128-9115

Brumbaugh Industries  
Mr. Charles Brumbaugh, President  
Route 291  
Eddystone, PA 19022

Chem Cell Corporation  
Mr. Charles Tirell, President  
P.O. Box 296  
Hatboro, PA 19040

Bunnell Plastics Incorporated  
c/o Furon Company  
Mr. J. Michael Hagan, CEO  
19982 Ivy Glenn Drive  
Aguna Indel, CA 92677

Chem-Par  
c/o Liphatech  
Dr. Author A. Nethery  
Vice President of Research & Development  
3101 West Custer Avenue  
Milwaukee, WI 53209

C.K. Systematics Incorporated  
c/o C.K. Worldwide  
Mr. Arthur Klepper, President  
P.O. Box 1636  
Auburn, WA 98071

\* Chem-Solv

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.

Chobert Associates  
c/o Chobert Manufacturing Corporation  
Mr. Frank J. Kearney, Jr.  
Vice President  
1018 Sanders Lane  
West Chester, PA 19380

\*\* Connecticut Mixed

Chrono-Log Corporation  
Mr. Arthur Freilich, President  
2 West Park Road  
Havertown, PA 19083-4691

Container Research Corporation  
Mr. Christopher J. Pass  
Industrial Engineer  
Hollow Hill Road  
P.O. Box 0159  
Glen Riddle, PA 19037

Classic Coachworks  
Mr. Harry Smith, President  
7310-18 West Chester Pike  
Upper Darby, PA 19082

Contamination Control Incorporated  
c/o Microdot Connectors  
Mr. Ernest Hartland, President  
306 Pasadena Avenue  
South Pasadena, CA 91030

Clifton Precision  
c/o Litton Industries Incorporated  
Jill Palmer, Esq.  
Senior Environmental Counsel  
1725 Jefferson Davis Highway, Suite 601  
Arlington, VA 22202

\* Continental Vanguard Incorporated

Coatings For Industry Incorporated  
Mr. James Klotz, President  
319 Township Line Road  
Souderton, PA 18964

\*\* Control Switch

Cobra Wire & Cable Company  
Mr. Bart Reitter, President  
2930 Turnpike Drive  
Hatboro, PA 19040

Controls Service & Engineering  
President  
300 Second Street  
New Cumberland, PA 17071

Concurrent Computer Corporation  
Karen G. Fink, Esq.  
Vice President & General Counsel  
2101 West Cypress Creek Road  
Fort Lauderdale, FL 33309

Cook Specialty Company  
Mr. Thomas A. Panzarella, President  
North Second Street  
P.O. Box 129  
Green Lane, PA 18054-0129

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

Crown Marketing Equipment Company  
President  
301 Ivyland Road  
Ivyland, PA 18974

\*\* Delaware Container Co. Inc.

CSS International Corporation  
Mr. Roger T. Nazeley, President  
2061 East Glennwood Avenue  
Philadelphia, PA 19124

\*\* Delco Wire & Cable, Inc./Delco Elec.

CW Industries  
Mr. Kalman Lifson, President  
130 James Way  
Southampton, PA 18966

Delmaco Manufacturing Incorporated  
President  
3 Cedar Creek Avenue  
Georgetown, DE 19947

Danco Tool & Mold Company  
Mr. Nicholas Fagan, President  
P.O. Box 448  
Wheatland and Melon Avenue  
Phoenixville, PA 19460

Deltron Incorporated  
Mr. Aaron Anton, President  
P.O. Box 1369  
North Wales, PA 19454

Data Media Incorporated  
c/o DMC Incorporated  
Mr. Thomas Rainone, President  
7025 Central Highway  
Pennsauken, NJ 08109

Dentronix Incorporated  
Ms. Cindy Monroe, President  
101 Steamwhistle Drive  
Ivyland, PA 18974

David K. Robson Incorporated  
Mr. Michael Anastas, President  
738 Maryland Avenue  
Prospect Park, PA 19076

Dettra Flag Company  
Mr. Elmer Bauer, President  
P.O. Box 408  
Oaks, PA 19456

Decision Data  
c/o Decision One  
Mr. Steve Felice, President  
50 East Swedesford Road  
Frasier, PA 19355

DeVilbiss Company  
c/o DeVilbiss Healthcare Incorporated  
Mr. Ray Dyre, President  
P.O. Box 635  
Somerset, PA 15501

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

Display Corporation of America  
c/o TSG Merchandising Incorporated  
Mr. Paul Schmidt, President  
1250 Easton Road, Suite 200  
Horsham, PA 19044

E. Hopkins Company  
Al Pappas, President  
3427 South Lawrence Street  
Philadelphia, PA 19148

Diversified Electronic Corporation  
Mr. Bernard Shurman, President  
4969 Wakefield Street  
Philadelphia, PA 19144

E.I.T. Incorporated  
c/o Enterra Instrumentation Technology  
Mr. Howard Lawrence, President  
P.O. Box 744  
Sunbury, PA 17801

Dixon Industries Corporation  
c/o Furon Company  
Mr. Jerry Noonan, President  
29982 Ivy Glenn Drive  
Laguna Nigel, CA 92677

E/M Corporation  
c/o West Lafayette Corporation  
Mr. Robert McDonald, President & CEO  
One Great Lakes Boulevard  
West Lafayette, IN 47906

Doehler-Jarvis  
Mr. Robert J. Jacobson  
Director of Environmental Control  
P.O. Box 902  
Toledo, OH 43697-0902

East West Label Company Incorporated  
Mr. Christopher Wilson, President  
P.O. Box 7480  
St. Davids, PA 19087

\*\* Dorado Fabrics

Eaton  
c/o Eaton Corporation  
Mr. Stephen Hardis, CEO  
Eaton Center  
Cleveland, OH 44114

Drexelbrook Engineering  
Mr. Fred Maltby, CEO  
205 Keith Valley Road  
Horsham, PA 19044

Elco Corporation  
c/o Prentice Hall Corporate Systems  
Mr. Benedict Rosen, CEO  
319 Market Street  
Harrisburg, PA 17101

\*\* Dynamic Services

Electro Platers of York Incorporated  
Mr. David Sollenberger, President  
209 East Willow Street  
Wrightsville, PA 17368

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\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

\* Electroloy

F B F Industries Incorporated  
Mr. Edward McAllister, President  
Three Glenhardie Corporate Center  
1265 Drummers Lane, Suite 304  
Wayne, PA 19087-1570

Ellisco  
c/o Ellisco Industries  
Mr. Charles Foster, CEO & President  
8901 Yellow Brick Road  
Baltimore, MD 21237

Fabric Development  
Mr. Peter Schah, President  
P.O. Box 462  
1217 Mill Street  
Quakertown, PA 18951

Emeco  
c/o Emeco Industries Incorporated  
Mr. Jay Buchbinder, CEO  
805 West Elm Avenue  
Hanover, PA 17331

Fairfax Cleaners  
c/o Fairfax Valet Cleaners  
Mr. Arthur Kahn, Owner  
3 Fairfax Boulevard  
Wilmington, DE 19803

Empire Abrasive & Equipment Corporation  
Mr. John Gauntt, Controller  
2101 West Cabot Boulevard  
Langhorne, PA 19047-1893

Far East Foods  
Mr. Luke Marano, President  
4950 South Island Road  
Philadelphia, PA 19153

EMR Photoelectric  
c/o Schlumberger EMR  
Mr. John Hunka, President  
20 Wallace Road  
Princeton Junction, NJ 08550

\*\* Fendt Finding Co., Inc.

Ervins Crafts  
c/o Buchart Horn Incorporated  
Mr. Timothy M. Yohe, PE  
The Industrial Plaza of York  
445 West Philadelphia Street  
P.O. Box 15040  
York, PA 17405-7040

\*Fergusson

\*\* Ext - Corporol

Fluid Power Incorporated  
Mr. David Albrecht, CEO  
534 Township Line Road  
Blue Bell, PA 19422

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.

Formation Incorporated  
Mr. Chet Fennell, President  
121 Whittendale Drive  
Moorestown, NJ 08057

Gala Industries  
Mr. Alan Chapman, President & CEO  
6800 Westfield Avenue  
Pennsauken, NJ 08110

Formosa Plastics Corporation, Delaware  
c/o Formosa Plastics Corporation, USA  
Michael G. Karlis, Esq.  
9 Peach Tree Hill Road  
Livingston, NJ 07039-5702

Gas Springs  
c/o Stabilus Gas Spring Company  
Mr. Thomas Blomquist, President  
92 County Line Road  
Colmar, PA 18915-9607

Franklin Mint  
Howard P. Lucker, Esq.  
Vice President & General Counsel  
Franklin Center  
U.S. Route 1  
Franklin Center, PA 19091

Gateway Terminal  
Mr. John Pontecorro, President  
P.O. Box 179  
Carteret, NJ 07008

Fraser-Volpe Corporation  
Mr. Joseph Volpe, President  
1025 Thomas Drive  
Warminster, PA 18974

General Electric  
c/o Lockheed Martin Corporation  
Ms. Eileen Wisser  
Manager, Environment, Health, and Safety  
230 East Mall Boulevard  
King of Prussia, PA 19406

Frontier Chemical Waste Process  
President  
P.O. Box 1471  
4626 Royal Avenue  
Niagara Falls, NY 14303

General Electric  
c/o Lockheed Martin Missiles and Space  
Mr. Mark Posson  
Manager Environmental Protection Program  
ORGN. 47-10, Building 101  
1111 Lockheed Martin Way  
Sunnyvale, CA 94089

FTC Hazardous Incorporated  
c/o Fact Environmental Services  
c/o Hancock Industries  
Mr. Stewart Golen, CEO  
7333 Milnor Street  
Philadelphia, PA 19136

Giles & Ransome  
Mr. Michael D. Barnasevitch  
Risk Management Coordinator  
2975 Galloway Road  
Bensalem, PA 19020

G. K. Garrett Corporation  
Mr. Albert H. Voight, President  
2914 North 16th Street  
Philadelphia, PA 19132

\*\* Giltech, Inc.

<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.



Glah Brothers Incorporated  
c/o Formal Affairs Incorporated  
President  
41 South York Road  
Hatboro, PA 19040

H-V Industries Incorporated  
c/o Crown Cork & Seal Company Incorporated  
William T. Gallagher, Esq.  
P.O. Box 6208  
9300 Ashton Road  
Philadelphia, PA 19136

\*\* Globe Solvents

\*\* Hahn Truck Sales

Gould Incorporated  
c/o Gould Electronics Incorporated  
Michael Veysey, Esq.  
34929 Curtis Boulevard  
Eastlake, Ohio 44095

Hale Pumps Incorporated  
c/o Hale Products  
Mr. Wade Roberts, President  
700 Spring Mill Avenue  
Conshohocken, PA 19428

Graphic Packaging Corporation  
Mr. Thomas Warlick  
Corporate Environmental Manager  
350 Griggs Road  
Clover, SC 29710

Heel Company  
William H. Nehrkorn II, Esq.  
P.O. Box 8676  
Chattanooga, TN 37414

Green Tweed Company  
Mr. Henry Delfiner, CEO  
2075 Detwiler Road  
Kulpsville, PA 19433

Herman Goldner Company Incorporated  
Ms. Emma L. Anello  
Administrator  
7777 Brewster Avenue  
Philadelphia, PA 19153

Gulf & Western  
c/o Viacom International Incorporated  
Mr. Suner Redtone, CEO  
1515 Broadway  
New York, NY 10036

High Energy Company  
Mr. Dick Robbins, President  
Lower Valley Road  
Parkesburg, PA 19365

\*\* H & L Cleaners

Hollingsworth  
c/o John R. Hollingsworth Company  
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Imperial Specialty  
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\* Kosempel

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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
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\* Manorgraphics

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\* Lovekin Corporation

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\*\* Lowry's

Matheson Instrument  
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M Q S Inspection Incorporated/Magnaflux  
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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.  
\* Address investigation currently being conducted.  
\*\* Party has been identified as an orphan.



**MALVERN TCE CORRESPONDENCE TRACKING SYSTEM**  
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**PAGE: 18**  
**11/30/98**

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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

\* Address investigation currently being conducted.

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\* Waste Consulting & Brokerage

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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

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<sup>1</sup> Please refer to Comprehensive Mailing List for addresses of counsel representing De Minimis parties.

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## **Attachment B**

**Final Administrative Order on Consent for *De Minimis* Parties**

## **Attachment C**

**Volumetric Ranking Summaries/  
Overview and Methodology**

**Volumetric Ranking Summaries/  
Challenges and EPA's Response**



# Malvern TCE Volumetric Ranking Summaries/Overview and Methodology

This document provides a general overview and describes methodology utilized by EPA in the preparation of the Malvern TCE Superfund Site ("Site") Volumetric Ranking Summaries dated November 30, 1998 ("Summaries"). A description of *de minimis* settlement eligibility and requirements also is provided.

## I. VOLUMETRIC RANKING SUMMARIES: OVERVIEW

The volumetric ranking summaries reflect revisions made by EPA to draft Site volumetric ranking summaries prepared by EPA and distributed to potentially responsible parties ("PRPs") for the Site on November 3, 1997 and April 30, 1998. Among other things, the attached Summaries incorporate information obtained by EPA as a result of: a) EPA's review and/or reconsideration of challenges submitted by PRPs to EPA to prior draft Site volumetric ranking summaries; b) review by EPA of Site records; and c) EPA research into the continued existence and viability of various PRPs identified in connection with the Site.

### A. Generator and Transporter Volumetric Ranking Summaries

EPA has prepared two volumetric ranking summaries for the Site: a Generator Volumetric Ranking Summary ("Generator VRS") and a Broker/Transporter Volumetric Ranking Summary ("Broker/Transporter VRS"). As a result of EPA's review of Site records documenting transactions between PRPs and Chemclene, a number of brokers/transporters have been identified. The Summaries are intended to reflect all generator and broker/transporter PRP transactions at the Site and to attribute to each generator and broker/transporter identified at the Site, the full volume of waste into the Site contributed by each, as reflected in Site records. All documented shipments of waste to the Site are reflected in the Generator VRS; transactions involving brokers/transporters also are reflected in the Broker/Transporter VRS. See Section II.D. of this Overview and Methodology for additional details relating to generator and broker/transporter transactions.

### B. Information contained in Summaries

In general, the attached Summaries provide the following for each PRP:

#### 1. The volume of waste each PRP contributed to the Site.

This volume reflects, for each PRP, the total volume of waste, as measured in 55-gallon drum units, each PRP contributed to the Former Disposal Area ("FDA") and the Main Plant Area ("MPA") of the Site, areas used by Chemclene as part of its operations. These amount are reflected in the "FDA Drums" and the "MPA Drums" columns of the Summaries. See Section II.B.3. of this Overview and Methodology for details regarding EPA's methodology

relating to the FDA and MPA.

2. The percentage of waste each PRP contributed to the FDA and MPA.

This percentage reflects each PRP's percentage of waste contributed to the FDA and MPA, relative to the percentage of total waste sent by all PRPs to the FDA and MPA, respectively. These percentages are reflected in the "FDA %" and "MPA %" columns of the Summaries.

3. The revised percentage of waste each PRP contributed to the FDA and MPA.

EPA has determined that some Site PRPs are no longer financially viable corporate entities, and, therefore, are Site "orphans" that will not participate in any *de minimis* settlement with EPA. These orphan shares have been apportioned on a *pro rata* basis among non-orphan Site PRPs. This apportionment is reflected in the "Revised FDA %" and "Revised MPA %" columns of the Summaries.

4. *De minimis* settlement payment required of each settling *de minimis* PRP.

The Summaries include each eligible *de minimis* PRP's share of costs such PRP will be required to pay in order to participate in a *de minimis* settlement with EPA. The total payment required of each *de minimis* PRP is reflected in the "Total Payment" column of the Summaries. The total payment required of each PRP includes each PRP's share of costs associated with the FDA and MPA, as set forth in the "FDA Cost" and "MPA Cost" columns of the Summaries. In addition, the total payment required of each PRP includes a premium payment assessed by EPA to take into account remedy and cost risks assumed by EPA in connection with the Site and the *de minimis* settlement. The premium is not assessed on EPA's past costs, but only on the estimated future costs. Premiums are reflected in the "FDA Premium" and "MPA Premium" columns of the Summaries.

See the Explanation Sheets attached to the Summaries for additional details regarding the information contained in the Summaries.

## II. **METHODOLOGY UTILIZED BY EPA WHEN CREATING THE VOLUMETRIC RANKING SUMMARIES**

### A. Documents Used

The Summaries prepared for the Site were compiled using Site documents obtained by EPA from Chemclene. These documents, which include invoices, receipts, purchase orders, manifests, and a number of other related documents, refer to transactions dating from 1968 until 1992 between Chemclene and its customers. These documents memorialize a number of

different types of transactions, reflecting the varied nature of Chemclene's business and Chemclene's changing billing practices. Examples of the transactions reflected in the documents include, but are not limited to:

1. Shipment of solvent and non-solvent waste from waste generators to Chemclene for processing and/or disposal;
2. Transshipments of solvent and non-solvent waste from Chemclene to other treatment, storage and disposal facilities;
3. Transfer of reclaimed solvents from Chemclene back to the original waste generator;
4. Transfer of raw or reclaimed solvent from Chemclene to customers;
5. Return of unused solvents or unused empty drums from customers to Chemclene;
6. Transfer of empty drums from Chemclene to waste generators to be filled up with wastes;
7. Purchases of raw materials by Chemclene;
8. Sale of services (such as waste sampling or transport services) by Chemclene to customers; and
9. Charges by Chemclene for off-Site disposal of still-bottoms resulting from the on-Site processing of wastes.

B. Interpretation of Documents

1. Waste into the Site

Based upon its understanding of Chemclene's operations, EPA has assumed that any unit of waste shipped to the Site was just as likely to have become a contaminant in the environment as any other unit of waste.

In preparing the volumetric ranking, EPA has examined carefully the Site documents to determine which transactions indicate the shipment of waste to Chemclene, and to determine the volume of these shipments.

The majority of transactions reflected in the Summaries are documented by a Chemclene invoice. In many instances, however, there are other documents that reveal the

details of the transaction more clearly than the invoice. For most transactions, the nature of the transaction is clear regardless of which document is examined. However, in some cases the nature of the transaction becomes clear only by comparing two or more documents. In all instances, EPA looked at all of the documents related to a transaction before determining how to interpret the documents.

## 2. Time Period Summarized

For purposes of preparing the VRS, EPA reviewed and summarized existing Site documents, which refer to the 1968 to 1992 time period. EPA is aware that Chemclene operations at the Site commenced in approximately 1952. However, since EPA does not have information relating to the 1952 to 1968 period of Chemclene operations, EPA has made no assumptions regarding waste transactions during that time period, and has not attempted to summarize waste transactions during that time period. Available information indicates that Chemclene withdrew its Part B Application submitted pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. § 6901 *et seq.*, to operate as a treatment and storage facility, and stopped accepting waste solvent for reclamation in July 1992.

## 3. Main Plant Area and Former Disposal Area

Information available to EPA indicates that Chemclene utilized both the MPA and FDA as part of Chemclene's operations. At all times during its operation, until approximately July 1992, Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including hazardous substances. All wastes sent to the Site initially went to the MPA. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations. Chemclene also disposed of wastes, including hazardous substances, at the FDA. Chemclene claims that disposal at the FDA ceased when new management took over the business in approximately August 1975, at which point Chemclene discontinued use of the FDA and disposed of waste generated from the reclamation process off-Site.

Based upon the foregoing information, when preparing the volumetric ranking summaries for the Site, EPA counted all waste transactions between Chemclene and PRPs during the 1968 to August 1975 time period as waste into both the MPA and the FDA. EPA has counted waste transactions between Chemclene and PRPs after August 1, 1975, only as waste into the MPA.

The distinction between the MPA and the FDA is meaningful in two ways: a) in the setting of the cut-off delineating which PRPs may be eligible to participate in a *de minimis* settlement; and b) in determining the amount of monies eligible *de minimis* PRPs will be required to pay in order to participate in a *de minimis* settlement with EPA.

Each PRP's eligibility for *de minimis* status will be determined using the percentage of the total waste sent to the Site by the PRP. This percentage is set forth in the

"MPA %" column of the Summaries, since all waste into the Site was received and processed by Chemclene at the MPA.

The Site remedy selected by EPA in its Record of Decision dated November 26, 1997, has provided for distinct remedies for the MPA and FDA. Even though significant aspects of the cleanup of the MPA and the FDA may be combined, EPA believes that costs of the remedy can be allocated fairly between the two areas. EPA separately has calculated the *de minimis* settlement payments of each eligible *de minimis* PRPs for the MPA and FDA and has added these amounts to obtain a "Total Payment" required.

#### 4. Transshipments

Based upon EPA's understanding of Chemclene's operations and review of Site records, EPA has determined that some waste received by Chemclene at the Site likely was transshipped off-Site, e.g. shipped off-Site for processing and/or disposal. Information available to EPA indicates that Chemclene often would containerize and store at the Site these wastes for off-Site shipment at some later date, and that releases or threatened releases of these wastes at the Site occurred as a result of Chemclene's practice.

EPA did not count as waste into the Site, transactions that appear to reflect that waste was sent off-Site for processing or disposal *only* in those instances where EPA could document, typically through its review of waste manifests, that such wastes remained in their original shipping containers and were not bulk-stored or otherwise opened and handled on-Site, prior to off-Site shipment.

#### C. Units of Measurement

To the extent applicable, EPA has prepared the volumetric ranking in accordance with OSWER Directive 9835.16, "Guidance to Preparing and Releasing Waste-In Lists and Volumetric Rankings to PRPs Under CERCLA," dated February 22, 1991. The most common unit of shipment was the 55-gallon drum, and therefore all other units found in the documentation were converted to 55-gallon drum units. When units were listed in gallons or other units of volume, simple mathematics was used to convert into drum units. For those entries with less than 55 gallons, a decimal was used. For example, if the documents indicated ten 30-gallon containers of waste shipped to Chemclene, then the 300 gallons of waste would be divided into 55-gallon units yielding 5.45 drums.

In a comparatively few instances, shipments of waste were listed in units of weight or other units. In these instances EPA used the following assumptions:

- For those entries listing pounds as the measurement unit, EPA's standard conversion factor of 1 gallon = 8.33 pounds was extrapolated to 55 gallons = 458 pounds.

- 1 can = 5 gallons.
- 1 bottle = 1 gallon.
- 1 lab pack = 1 gallon.

In addition, a small number of transactions indicated the shipment to Chemclene of "empty" drums or other containers which are listed as "used" or "dirty" or some other language indicating that the container had at one time contained waste. In these instances EPA assumed that the container contained 3% of its capacity in hazardous wastes, based upon the definition of "empty" in the RCRA regulations. *See* 40 C.F.R. § 261.7.

#### D. Brokers/Transporters

As a result of its review of Site documents, EPA has identified a number of PRPs that appear to have acted as brokers and/or transporters of waste to the Site. EPA has included broker/transporter PRPs in the Summaries.

Most Site records that identify brokers/transporters refer to brokers/transporters with whom it appears Chemclene dealt directly. A number of Site records, for example, reflect that Chemclene directly billed and/or credited such brokers/transporters with regard to waste transactions at the Site.

The Site records that refer to broker/transporter PRPs identify two types of transactions: 1) transactions in which a broker/transporter appears to have arranged for the transport or disposal of or transported waste generated by a third-party to the Site, and in which both the broker/transporter and the generator are expressly identified in the corresponding Site record; and 2) transactions between a broker/transporter and Chemclene where no third-party generator has been identified. In the latter instance the documentation is the same as for any other generator, and the party listed on the documentation is thus treated as a generator for those transactions, even if the same party may have acted as a broker/transporter in other instances.

Consistent with OSWER Directive 9835.16, whenever a Site record reflects a transaction in which both a generator PRP and a broker/transporter PRP are expressly identified, EPA has attributed the waste volume referred to in each such transaction to both the generator and the broker/transporter for purposes of compiling waste-in information contained in the Summaries. However, EPA has counted the total waste referred to in these transactions only once for purposes of determining total waste contributed to the Site by all PRPs.

The Generator VRS summarizes waste volume information: 1) for each generator PRP; and 2) for each broker/transporter PRP only with regard to those broker/transporter transactions with Chemclene for which no corresponding third-party generator has been identified. As set forth above, in cases where a third-party generator is not identified, the party named on the

invoice or other documentation has been treated as a generator for that transaction even if the party involved has been identified as a broker/transporter for other transactions.

The total waste contributed to the Site by all PRPs appears at the end of the Generator VRS.

EPA has prepared a separate Broker/Transporter VRS in order to summarize those waste-in transactions in which both a broker/transporter and a generator have been identified. The waste volume reflected in these transactions also has been summarized for each corresponding generator in the Generator VRS. By preparing a separate Broker/Transporter VRS, EPA can attribute to each broker/transporter the waste reflected in these transactions, but avoid double-counting the waste when determining total waste contributed to the Site by all Site PRPs (as reflected in the Generator VRS).

Broker/transporter PRPs should refer to both the Generator VRS and the Broker/Transporter VRS in order to determine waste volume and percentage information.

For purposes of a *de minimis* settlement, both the generator and the broker/transporter will be liable for the full amount of the waste in a transaction involving both a generator and a broker/transporter. In other words, for some shipments two parties both will be fully liable for the share of the cleanup represented by those drums. However, parties can avoid full liability if the broker/transporter and the generator cooperate with each other and agree to an allocation between themselves. In such instances, the broker/transporter and the generator may *jointly* settle with EPA for the full amount of the wastes in question, and avoid having to *each* pay for the wastes.

#### E. Grouped PRPs

Based upon information obtained by EPA, EPA has concluded that some Site PRPs are related or successor entities to other Site PRPs. EPA has grouped related/successor entities in the attached Summaries. For each such grouping, EPA has determined the grouping's total volume and percentage liability at the Site based upon the combined totals of each related/successor entity. Total volume and percentage information for each grouping is set forth in the Generator VRS that is arranged alphabetically by PRP. Total volume and percentage information for each grouping is set forth under the name of the PRP grouping and appears in bold print. Volume and percentage information for each separate related/successor PRP member of the grouping also is set forth in the Summaries.

#### F. Orphan PRPs

When a PRP is unable to pay all or part of its allocated share of a cleanup, EPA may allocate such a share among the viable PRPs in the same ratio as other cleanup costs. Pursuant to EPA's "Orphan Share" policies, EPA, under certain circumstances, may pay (from the

Superfund) a portion of the shares of PRPs that are completely non-viable. Orphan share funding may be available only to PRPs that agree to implement and fund remedial actions at a site, and not to *de minimis* PRPs. *De minimis* PRPs may be asked to pay on a *pro rata* basis for any shares for which the orphan PRPs are unable to pay. In addition, the *de minimis* premium will take into consideration the likelihood that additional such shares will be identified subsequent to the conclusion of the *de minimis* settlement.

When EPA has been able to identify a PRP as an orphan in the attached summaries, EPA has included for each such PRP, total volume and percentage information. EPA does not anticipate that Site orphans will participate in the *de minimis* settlement or otherwise pay monies towards Site remediation. Therefore, EPA has not included payment information for any Orphan. In addition, EPA has revised each non-Orphan PRP percentage ("Revised FDA %" and "Revised MPA %"), reflecting each non-orphan PRPs *pro rata* payment share for each Site orphan.

The calculation of the revised percentages has been done on a transaction by transaction basis. If a transaction involves an orphan generator, then the transaction was checked to determine if there was a broker/transporter for the same transaction. A transaction has been divided on a *pro rata* basis among the remaining PRPs only if there is *neither* a viable generator *nor* a viable broker/transporter for the transaction.

### III. ***DE MINIMIS* SETTLEMENT**

#### A. *De Minimis* Cutoff

EPA has established a cut-off for *de minimis* settlement eligibility using a percentage of the total waste sent to the Site by the PRP. A PRP is eligible to participate in a *de minimis* settlement if its volumetric contribution of hazardous substances to the Site is at or less than 0.75% of the total volume attributed to the MPA. Pre-August 1975 percentages that have been assigned for the FDA have not been considered by EPA when establishing the *de minimis* settlement eligibility cutoff. However, such percentages have been considered by EPA when determining the amount of money each *de minimis* PRP will be asked to pay if it desires to settle.

EPA has also established a *de micromis* cutoff at 1.5 drums or less. EPA does not foresee a need for settlements with *de micromis* parties. EPA will, however, pursue settlements with *de micromis* parties if there is a threat of, or an actual suit by, other PRPs at the Site.

#### B. *De Minimis* Payments

The attached Summaries contain *de minimis* settlement payment information for each eligible *de minimis* settlement. EPA has divided the costs of the selected remedy, as set forth in the ROD, between the MPA and FDA, and has determined each *de minimis* PRP's required settlement payments for each of these areas of the Site. A PRP's required *de minimis* payment is



determined based upon its revised percentages for the FDA and the MPA. These revised percentages are then applied to the total costs estimates for the MPA and the FDA.

As of June 17, 1997, EPA incurred approximately \$2,214,705.00 in response costs ("Past Response Costs") at or in connection with the Site. Since EPA incurred the Past Response Costs as a result of activities that pertained to both the FDA and MPA, EPA has attributed one-half (\$1,107,352.00) of the Past Response Costs to FDA costs and the other one-half (\$1,107,352.00) to MPA costs. EPA has estimated future Site costs associated with cleanup and EPA oversight of the Site to be approximately \$15,729,151.00 (\$15,529,151.00 in remedial costs; \$200,000.00 in EPA remedial oversight). Of that amount, approximately \$8,155,725.00 has been attributed by EPA to cleanup of the FDA (\$8,055,725.00 in remedial costs; \$100,000.00 in EPA remedial oversight). Future costs associated with cleanup and EPA oversight of the MPA are approximately \$7,573,426.00. (\$7,473,426.00 in remedial costs; \$100,000.00 in EPA remedial oversight).

EPA has assessed a premium, which each *de minimis* PRP must pay in addition to each PRP's percentage of FDA and MPA costs, in order to participate in the *de minimis* settlement with EPA. The premium is intended to take into account a number of Site factors and risks, including additional remedial action and potential response cost overruns, that EPA may encounter when settling with *de minimis* PRPs. EPA has established a premium of 50% in this matter, i.e. a multiplier of .50.

# **Malvern TCE Superfund Site Volumetric Ranking Challenges and EPA's Response**

The Final Volumetric Ranking Summaries dated November 30, 1998 ("Summaries") reflect, among other things, revisions made by EPA in response to comments and challenges received from PRPs with regard to prior draft volumetric ranking summaries distributed by EPA for review.

A number of the comments and challenges submitted by PRPs were PRP-specific counting challenges, referring to individual PRP waste-in determinations of EPA. However, certain comments and challenges submitted pertained to the overall methodology utilized by EPA when preparing the Summaries.

The following sets forth the most common methodology comments and challenges reviewed by EPA and EPA's response to the same<sup>1</sup>:

## **1. COMMENT:**

The volumetric ranking summaries should include all broker/transporter PRPs at the Site. EPA should allocate generators and brokers/transporters percentage shares of liability at the Site.

## **EPA'S RESPONSE:**

As a result of its review of Site documents, EPA has identified a number of PRPs that appear to have acted as brokers and/or transporters of waste to the Site. EPA has included all identified broker/transporter PRPs and broker/transporter transactions in the Summaries.

Most Site records that identify brokers/transporters refer to brokers/transporters with whom it appears that Chemclene dealt directly. A number of Site records, for example, reflect that Chemclene directly billed and/or credited such brokers/transporters with regard to waste

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<sup>1</sup> This document is intended to discuss only common methodology comments and challenges submitted by Site PRPs to EPA. Any PRP that submitted a PRP-specific counting challenge may contact Gary Morton, EPA Civil Investigator, to obtain information regarding EPA's review of its challenge. Inquiries should be sent in writing to:

Gary Morton, 3HS11  
Civil Investigator  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

transactions at the Site. A number of the brokers/transporters identified appear to have provided services involving the Site on behalf of a variety of generators.

The Site records that refer to broker/transporter PRPs typically identify two types of transactions: 1) transactions in which a broker/transporter appears to have arranged for the transport or disposal of or transported waste generated by a third-party to the Site, and in which both the broker/transporter and the generator are expressly identified in the corresponding Site record; and 2) transactions between a broker/transporter and Chemclene, where no third-party generator has been identified, but the party on the documentation acted as a broker/transporter in other transactions with Chemclene.

Whenever a Site record reflects a transaction in which both a generator PRP and a broker/transporter PRP are expressly identified, consistent with OSWER Directive 9835.16, ("Guidance on Preparing and Releasing Waste-In Lists and Volumetric Rankings to PRPs under CERCLA," dated February 22, 1991), EPA has attributed the waste volume referred to in each such transaction to both the generator and the broker/transporter for purposes of compiling waste-in information contained in the Summaries. However, EPA has counted the total waste referred to in these transactions only once for purposes of determining total waste contributed to the Site by all PRPs.

EPA has created a Generator VRS, which summarizes waste volume information for: 1) each generator PRP; and 2) each broker/transporter PRP only with regard to those broker/transporter transactions with Chemclene for which no third-party generator has been identified. In cases where a third-party generator is not identified, the party named on the invoice or other documentation has been treated as a generator for that transaction even if the party involved has been identified as a broker/transporter for other transactions. As a practical matter, it makes no difference to a party whether it is listed as a generator or a broker/transporter for a particular transaction - in either instance the transaction will be counted toward the party's total. The Generator VRS reflects the total waste contributed to the Site by all PRPs.

EPA has prepared a separate Broker/Transporter VRS in order to summarize those waste-in transactions in which both a broker/transporter and a generator have been identified. The waste volume reflected in these transactions also has been summarized for each corresponding generator in the Generator VRS. By preparing a separate Broker/Transporter VRS, EPA can attribute to each broker/transporter the waste reflected in these transactions, but avoid double-counting the waste when determining total waste contributed to the Site by all Site PRPs (as reflected in the Generator VRS).

## **2. COMMENT:**

EPA erroneously counted as waste into the Site materials that were sent to the Site but shipped off-Site for disposal.

### **EPA'S RESPONSE:**

Based upon its understanding of Chemclene's operations and its review of Site records, EPA has determined that some waste received by Chemclene at the Site was shipped off-Site for processing and/or disposal. Information available to EPA indicates that Chemclene often would containerize and store these wastes at the Site for off-Site shipment at some later date, and that releases or threatened releases of these wastes at the Site occurred as a result of Chemclene's practice.

EPA did *not* count waste transactions that appear to reflect that waste was sent off-Site for processing or disposal. In order for such transactions not to be counted by EPA, EPA must have been able to document that such wastes remained in their original shipping containers and were not bulk-stored or otherwise opened and handled on-Site, prior to off-Site shipment.

### **3. COMMENT:**

Pre-1968 transactions with Chemclene should be included in EPA's waste-in determinations relating to the Site.

### **EPA'S RESPONSE:**

Information currently available to EPA indicates that Chemclene utilized the Site for its waste reclamation operations from approximately 1959 to 1992. The Site records that have been utilized by EPA when preparing the Summaries refer only to the 1968 to 1992 time period. EPA has not attempted to incorporate pre-1968 transactions at the Site into the Summaries. EPA has no evidence as to the identity of PRPs or the quantity and/or nature of waste transactions with Chemclene during the pre-1968 time period, and is unable and unwilling to speculate as to this information.

EPA also has not identified pre-1968 transactions as transactions for which orphan share funding should be made available. When a PRP is unable to pay its allocated share of a cleanup, EPA may allocate such a share among the viable PRPs in the same ratio as other cleanup costs. Pursuant to EPA's "Orphan Share" policy, under certain circumstances, EPA may pay (from the Superfund) a portion of the shares for PRPs that are completely non-viable. Orphan share funding may be available only to PRPs that agree to implement and fund remedial actions at a site, and not to *de minimis* PRPs.

When EPA has been able to identify a Site PRP as an orphan, EPA has incorporated this information in the Summaries. EPA has not attempted to calculate any pre-1968 orphan share, since EPA has no information as to the identity of any pre-1968 Site PRPs, nor as to any such PRPs' current corporate status.

4. **COMMENT:**

The owners/operator of the Site should be included in the Summaries.

**EPA'S RESPONSE:**

EPA has identified Chemclene as a PRP based upon its Site owner/operator status. Lloyd Balderston, Chemclene's sole shareholder, has been notified of his status as PRP at the Site due to his position as a Site operator during periods in which releases occurred. In addition, Ruth Balderston has been identified as a PRP based upon her status as a past owner of the Site during a period in which releases occurred.

Chemclene and the Balderstons have not been allocated shares in the Summaries. In accordance with OSWER Directive 9835.16, the Summaries are designed to rank waste generators and brokers/transporters. Chemclene does not appear to have the financial capability to completely clean up the Site. Nevertheless, EPA considers Chemclene and the Balderstons to be viable PRPs who should participate to the fullest extent possible in Site remediation and funding.

5. **COMMENT:**

When determining PRP liability at the Site, EPA should take into account separate waste-in rankings for the Former Disposal Area ("FDA") and the Main Plant Area ("MPA"), areas of the Site utilized by Chemclene as part of its operations.

**EPA'S RESPONSE:**

Information available to EPA indicates that Chemclene utilized both the FDA and the MPA of the Site as part of Chemclene's operations. At all times during its operation, until approximately July 1992, Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including hazardous substances. All wastes sent to the Site initially went to the MPA. Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations.

Chemclene also disposed of wastes, including hazardous substances, at the FDA. Chemclene claims that disposal at the FDA ceased when new management took over the business in approximately August 1975, at which point Chemclene discontinued use of the FDA and disposed of waste generated from the reclamation process off-Site.

Based upon the foregoing information, when preparing the volumetric ranking summaries for the Site, EPA counted all waste transactions between Chemclene and PRPs during the 1968 to August 1975 time period as waste into both the MPA and the FDA. EPA has counted waste transactions occurring after August 1, 1975, between Chemclene and PRPs, only as waste into the MPA.

Each PRP's eligibility for *de minimis* status will be determined by reference to each PRP's percentage using the waste-in information for the MPA, where all waste into the Site was received and processed by Chemclene.

EPA has utilized the separate PRP waste-in rankings for the FDA and MPA in order to determine settlement payments that will be required by *de minimis* PRPs. The Site remedy selected by EPA in its Record of Decision dated November 26, 1997, has provided for distinct remedies for the MPA and FDA. Even though significant aspects of the cleanup of the MPA and the FDA may be combined, EPA believes that costs of the remedy can be allocated between the two areas. EPA has calculated settlement payments required of each eligible *de minimis* PRP by determining separately for the FDA and MPA the remedial and oversight costs associated with each of these areas of the Site, and then calculating each PRP's *de minimis* payment obligation with respect to these disparate costs.

EPA recognizes that PRPs that are not eligible for *de minimis* settlement may wish to allocate liability among themselves for disparate remedies selected for the FDA and MPA.

6. **COMMENT:**

Waste oil wastes should not be counted as waste into the Site.

**EPA'S RESPONSE:**

When preparing the Summaries, EPA assumed that all waste sent to the Site was either processed or stored at the Site. Although parties have stated that Chemclene only brokered waste oil, it is EPA's belief that waste oil sent to the Site was transferred on-Site and bulk stored. Additionally, waste oil components have been found at the Site at both the FDA and MPA. The Site remedy selected by EPA is designed to address solvents and other hazardous substances, including those typically found in waste oil, at the Site. Accordingly, unless a PRP making such a challenge provided EPA with an analysis of the actual waste sent to the Site, indicating that the waste did not contain hazardous substances, the waste was included in the Summaries.

**Malvern TCE Superfund Site**  
**Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.<sup>1</sup>

<u>PRP Name</u>	<u>FDA Drums</u>	<u>FDA %</u>	<u>FDA Revised %</u>	<u>FDA Cost</u>	<u>FDA Premium</u>	<u>MPA Drums</u>	<u>MPA %</u>	<u>MPA Revised %</u>	<u>MPA Cost</u>	<u>MPA Premium</u>	<u>Total Payment</u>
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>3</sup> and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>1</sup> received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>2</sup> and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>3</sup> The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Hamilton Watch Co.	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
<b>Syntex/Star Grouping</b>											
Star Dental Corporation						610.00	2.21%	2.28%			D, A
Plymouth Tube	9.00	0.39%	0.40%			566.37	2.05%	2.12%			A
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Burroughs Corp.	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Reilly Plating						430.00	1.56%	1.61%			A
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Morning Call						355.00	1.29%	1.33%			A
Delbar Products						328.50	1.19%	1.23%			A
<b>USG Grouping</b>											
Donn Corporation						292.00	1.06%	1.09%			D, A

\* Superceding 4/27/98 VRS

A *De maximus* party and does not qualify for *de minimis* settlement offer.

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary.

E *De micromis* party.



**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Kim Manufacturing						283.00	1.03%	1.06%			A
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Aydin						251.82	0.91%	0.94%			A
Beckett Corporation						250.55	0.91%	0.94%			A
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Handy & Harman Tube Co. Inc						229.18	0.83%	0.86%			A
Porter Instruments						228.27	0.83%	0.85%			A
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
<b>Cabot Grouping</b>											
Kawecki Berylco						218.00	0.79%	0.82%			D, A
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918
<b>Defense Reutilization &amp; Marketing Grouping</b>											
DRMS/PNSY						200.72	0.73%	0.75%			D, A
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
McClarín Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912

\* Superceding 4/27/98 VRS

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E *De micromis* party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
<b>USG Grouping</b>											
U S G Interiors						182.00	0.66%	0.68%			D, A
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
<b>Cabot Grouping</b>											
Cabot Berylco						143.00	0.52%	0.54%			D, A
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
S K F Industries Inc.						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
R & E Martin, Inc.						116.29	0.42%	0.44%			C
<b>Syntex/Star Grouping</b>											
Syntex Dental Products						115.00	0.42%	0.43%			D, A
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695

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E *De micromis* party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Waste Conversion						104.00	0.38%	0.39%			C
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
<b>Defense Reutilization &amp; Marketing Grouping</b>											
DRMO Knox						74.00	0.27%	0.28%			D, A
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809
<b>USG Grouping</b>											
Floor Systems Inc.						71.40	0.26%	0.27%			D, A

\* Superceding 4/27/93 VRS

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E *De micromis* party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
Scotco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Welex Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
North Industrial Chemicals						60.00	0.22%	0.22%			C
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
<b>Defense Reutilization &amp; Marketing Grouping</b>											
DRMO PHILADELPHIA						54.00	0.20%	0.20%			D, A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Delco Wire & Cable, Inc./ Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
M Q S Inspection Inc./Magnaflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
J & J Spill						43.00	0.16%	0.16%			C, A
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
<b>USG Grouping</b>											
Davey Products						41.00	0.15%	0.15%			D, A
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Carvel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Manorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
<b>Cabot Grouping</b>											
Cabot Wrought Products						27.00	0.10%	0.10%			D, A
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Amuneal Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendtru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Camdel Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Cantol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Sikkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Pennwalt Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plate Crafters Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Boekel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
<b>Cabot Grouping</b>											
Cabot Company						13.00	0.05%	0.05%			D, A
<b>Defense Reutilization &amp; Marketing Grouping</b>											
Madison, IN						13.00	0.05%	0.05%			D, A
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Photolastic Inc.	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Dettra Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B

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E De micromis party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Ellisco						8.36	0.03%	0.03%	\$2,718	\$1,186	\$3,903
<b>Defense Reutilization &amp; Marketing Grouping</b>											
Picatinny Arsenal						8.26	0.03%	0.03%			D, A
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
Bilgram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B

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E *De micromis* party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Met Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lovekin Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Tele Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Fergusson						5.96	0.02%	0.02%	\$1,938	\$845	\$2,783
Boyertown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ervins Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

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E *De micromis* party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Ext -Corporol						4.00	0.01%	0.00%	\$0	\$0	B
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Permutit/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
R C Kletzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167

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E De micromis party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Money Systems						1.00	0.00%	0.00%			E
National Computer Systems						1.00	0.00%	0.00%			E
National Products						1.00	0.00%	0.00%			E
Perkin-Elmer						1.00	0.00%	0.00%			E
Pocono Foundry Inc.						1.00	0.00%	0.00%			E
Schmidt Brewery Co.						1.00	0.00%	0.00%			E
Schramm Inc.						1.00	0.00%	0.00%			E
Specialty Glass Products						1.00	0.00%	0.00%			E
Tube Methods						1.00	0.00%	0.00%			E
Tudor Tech Inc.						1.00	0.00%	0.00%			E
Welding Co.						1.00	0.00%	0.00%			E
T R W Inc.						0.45	0.00%	0.00%			E
Budd Co.						0.36	0.00%	0.00%			E
Jenson, Homer						0.36	0.00%	0.00%			E
Wittronics						0.30	0.00%	0.00%			E
Lightman Drum Co.						0.27	0.00%	0.00%			C
Mack Electric						0.27	0.00%	0.00%			E
Chester County Intermediate Unit						0.07	0.00%	0.00%			E
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			E
<b>De Minimis Total:</b>	<b>573.00</b>	<b>25.09%</b>	<b>23.48%</b>	<b>\$2,158,627</b>	<b>\$950,287</b>	<b>9854.37</b>	<b>35.69%</b>	<b>33.51%</b>	<b>\$2,795,132</b>	<b>\$1,219,287</b>	<b>\$7,123,333</b>
<b>Total:</b>	<b>2283.71</b>	<b>100.00%</b>	<b>100.00%</b>			<b>27608.87</b>	<b>100.00%</b>	<b>100.00%</b>			

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**Malvern TCE Superfund Site**  
**Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.<sup>1</sup>

<u>PRP Name</u>	<u>FDA Drums</u>	<u>FDA %</u>	<u>FDA Revised %</u>	<u>FDA Cost</u>	<u>FDA Premium</u>	<u>MPA Drums</u>	<u>MPA %</u>	<u>MPA Revised %</u>	<u>MPA Cost</u>	<u>MPA Premium</u>	<u>Total Payment</u>
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

PRP Name = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies; therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

FDA Drums = The total number for drums sent to the Site before August 1, 1975.

FDA % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

FDA Cost = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>3</sup> and estimated future cost associated with the FDA.

FDA Premium = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

MPA Drums = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible.

MPA % = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

MPA Revised % = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>1</sup> received by Chemclene Corporation, regardless of date, multiplied by 100.

MPA Cost = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>2</sup> and estimated future cost associated with the MPA.

MPA Premium = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

Total Payment = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>3</sup> The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
A. Duie Pyle						1.00	0.00%	0.00%			D
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Ace Service Corp.						1.00	0.00%	0.00%			D
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Agitar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Albright Paper & Box Corp.						1.11	0.00%	0.00%			D
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Alfa-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Allister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Amp Corp.	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,238	\$18,861	\$264,984

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D *De micromis* party.



**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Amuneal Mfg. Co.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Anchor Darling Co.						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Antenna Corp.						1.00	0.00%	0.00%			D
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
Armstrong Cork Co.						522.70	1.89%	1.96%			A
Artco Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Athena Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Aydin						251.82	0.91%	0.94%			A
B. P. Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Beckett Corporation						250.55	0.91%	0.94%			A
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendtru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Bilgram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Bishop Tube Co.	60.00	2.63%	2.68%	\$248,594	\$109,438	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Boeing Property						2.00	0.01%	0.01%	\$650	\$284	\$934
Boekel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Boyertown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Budd Co.						0.36	0.00%	0.00%			D
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Burroughs Corp.	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
C S S International Corp.	8.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,958	\$5,653	\$66,349
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
C. K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
<b>Cabot Grouping</b>						<b>401.00</b>	<b>1.45%</b>	<b>1.50%</b>			<b>A</b>
Cabot Berylco						143.00	0.52%	0.54%			A
Cabot Wrought Products						27.00	0.10%	0.10%			A
Cabot Company						13.00	0.05%	0.05%			A
Kawecki Berylco						218.00	0.79%	0.82%			A
Camdel Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Cantol Inc.						20.09	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Carvel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Chester County Intermediate Unit						0.07	0.00%	0.00%			D
Chobert Associates						85.15	0.31%	0.32%	\$27,682	\$12,075	\$39,757
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$891	\$2,932
Cincinnati Time						1.00	0.00%	0.00%			D
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,658	\$11,629	\$241,172
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Concurrent Computer Corp.						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Cyprus Foote Mineral Co.						495.00	1.79%	1.85%			A
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
David K. Robson, Inc.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
<b>Defense Reutilization &amp; Marketing Grouping</b>						<b>349.98</b>	<b>1.27%</b>	<b>1.31%</b>			<b>A</b>
Madison, IN						13.00	0.05%	0.05%			A
DRMS/PNSY						200.72	0.73%	0.75%			A
DRMO PHILADELPHIA						54.00	0.20%	0.20%			A
Picatinny Arsenal						8.26	0.03%	0.03%			A
DRMO Knox						74.00	0.27%	0.28%			A
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
Delbar Products						328.50	1.19%	1.23%			A
Delco Wire & Cable, Inc./ Delco Elec.						47.00	0.17%	0.00%	\$0	\$0	B
Delmaco Mfg. Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Dettra Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
DeVilbiss, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Devon Apparel						1.00	0.00%	0.00%			D
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Diversified Electronic Corp.						15.53	0.06%	0.06%	\$5,049	\$2,202	\$7,251
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Doehler - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Drexelbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Durawood						1.00	0.00%	0.00%			D
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E. Hopkins Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E.I.T. Inc., Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,466	\$640	\$2,106
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Eaton	36.00	1.58%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$28,272	\$93,083
Electro Tech Systems Inc.						1.00	0.00%	0.00%			D
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Ellisco						8.36	0.03%	0.03%	\$2,718	\$1,186	\$3,903
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Empire Abrasive & Equipment Corp.						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
Ervins Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ext -Corporol						4.00	0.01%	0.00%	\$0	\$0	B

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,698
Fabric Development						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Fairchild Space Systems						1.00	0.00%	0.00%			D
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Fendt Finding Co., Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Fergusson						5.96	0.02%	0.02%	\$1,938	\$845	\$2,783
Fischer & Porter Co/Andrews Glass	93.00	4.07%	4.16%			794.50	2.88%	2.98%			A
Fluid Power, Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Frazer-Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
G. K. Garrett Corp.						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Gas Springs						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gateway Terminal						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,086	\$89,180
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Glah Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Gould Inc.						68.00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,448	\$27,814
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
H I Services Inc.						1.00	0.00%	0.00%			D
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hamilton Precision Metals						472.06	1.71%	1.77%			A
Hamilton Technology, Inc.						1234.00	4.47%	4.62%			A
Hamilton Watch Co.	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Handy & Harman Tube Co. Inc						229.18	0.83%	0.86%			A
Heel Co.						31.00	0.11%	0.12%	\$10,078	\$4,396	\$14,474
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
High Energy Company						84.64	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Hough/Loew Associates						1.09	0.00%	0.00%			D
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Hurst Perf.						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Imperial Specialty						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$165,466
J & J Spill						43.00	0.16%	0.16%			C
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,286	\$3,648	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695
Jenson, Homer						0.36	0.00%	0.00%			D
Jetshapes Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,089	\$28,829	\$94,918

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Johnson Company						2.00	0.01%	0.01%	\$650	\$284	\$934
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Kim Manufacturing						283.00	1.03%	1.06%			A
Kosempel						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Kulicke & Soffa						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
LaFrance Corp.	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
Laminators Inc.						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Lancaster Machinery Co.						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,622	\$26,881	\$88,503
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
Lightman Drum Co.						0.27	0.00%	0.00%			C
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
London Harness & Cable Co.						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Lovekin Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
M Q S Inspection Inc./Magnaflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
Mack Electric						0.27	0.00%	0.00%			D
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
Manorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201

\* Superceding 4/27/98 VRS

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D De micromis party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Electronics Inc.						110.99	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Mars Money Systems						1.00	0.00%	0.00%			D
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
McHugh Railroad Maint Equip Co.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Meade Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Met Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$993	\$45,039
Mida Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,296	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$469,691
Morning Call						355.00	1.29%	1.33%			A
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
N W Controls	4.00	0.18%	0.18%			374.59	1.36%	1.40%			A
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
National Computer Systems						1.00	0.00%	0.00%			D
National Metal Crafters						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
National Products						1.00	0.00%	0.00%			D
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
Netzsch Inc.						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,360
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669

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D *De micromis* party.



**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
North Industrial Chemicals						60.00	0.22%	0.22%			C
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Olympic Tool & Machine Co.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
P H L Inc.						2.00	0.01%	0.01%	\$650	\$284	\$934
P P & L Northern Div. S.C.						257.27	0.93%	0.96%			A
Paris Business Forms						2.00	0.01%	0.01%	\$650	\$284	\$934
Penflex Inc.	42.00	1.84%	1.88%	\$174,016	\$76,607	125.31	0.45%	0.47%	\$40,738	\$17,771	\$309,131
Penguin Industries						119.00	0.43%	0.45%	\$38,687	\$16,876	\$55,562
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,148
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Pennwalt Corp.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Penske V.D.A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Pepco Manufacturing Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Perkin-Elmer						1.00	0.00%	0.00%			D
Permutit/Sybron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peter Paul Cadbury Co.						2.00	0.01%	0.01%	\$650	\$284	\$934
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194
Petter Engraving Inc.						2.04	0.01%	0.01%	\$663	\$289	\$952
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,885	\$16,085
Philadelphia Rust Proof Co. Inc.						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$851	\$38,605
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C

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D De micromis party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Photolastic Inc.	11.00	0.48%	0.49%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
Plate Crafters Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plymouth Tube	9.00	0.39%	0.40%			566.37	2.05%	2.12%			A
Pocono Foundry Inc.						1.00	0.00%	0.00%			D
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Porter Instruments						228.27	0.83%	0.85%			A
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Princo Instruments Inc.						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Pyco Inc.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
R & E Martin, Inc.						116.29	0.42%	0.44%			C
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,594
R C Kletzing						2.50	0.01%	0.01%	\$813	\$355	\$1,167
R D L Inc.						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Reilly Plating						430.00	1.56%	1.61%			A
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
S K F Industries Inc.						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Sanivan Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Schmidt Brewery Co.						1.00	0.00%	0.00%			D
Schramm Inc.						1.00	0.00%	0.00%			D
Scotco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sermetal						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Shared Medical Systems						3.27	0.01%	0.01%	\$1,063	\$464	\$1,527
Sharples, Inc.						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Shur-Kut Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Sikkens Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Silvine						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Simco Company Inc.						4.52	0.02%	0.02%	\$1,469	\$641	\$2,110
Simon Wrecking Company Inc.	715.51	31.33%	32.00%			983.51	3.56%	3.68%			A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
Simpson Sign Co.						16.52	0.06%	0.00%	\$0	\$0	B
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solatario						57.00	0.21%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Sonic Instruments						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Specialty Castings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Glass Products						1.00	0.00%	0.00%			D
Sperry Univac						2.00	0.01%	0.01%	\$650	\$284	\$934
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809

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D *De micromis* party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Sprague-Griffiths Div.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Stein Seal Co.						138.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
Sterling Fleishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Sunroc Corp.	52.00	2.28%	2.33%			358.00	1.30%	1.34%			A
Suntemp Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,462
Sweda/Hugin Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Litton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
<b>Syntex/Star Grouping</b>						<b>725.00</b>	<b>2.63%</b>	<b>2.72%</b>			<b>A</b>
Syntex Dental Products						115.00	0.42%	0.43%			A
Star Dental Corporation						610.00	2.21%	2.28%			A
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
T R W Inc.						0.45	0.00%	0.00%			D
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,985	\$6,537
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
Tele Dynamics						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			D
Transducer Systems Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Tube Methods						1.00	0.00%	0.00%			D

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Tudor Tech Inc.						1.00	0.00%	0.00%			D
U S A Ardec						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
United Chem-Con Corp.						21.00	0.08%	0.00%	\$0	\$0	B
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
<b>USG Grouping</b>						<b>586.40</b>	<b>2.12%</b>	<b>2.20%</b>			<b>A</b>
U S G Interiors						182.00	0.66%	0.68%			A
Floor Systems Inc.						71.40	0.26%	0.27%			A
Donn Corporation						292.00	1.06%	1.09%			A
Davey Products						41.00	0.15%	0.15%			A
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Victualic Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Viz Manufacturing	104.00	4.55%	4.65%			819.84	2.97%	3.07%			A
Waste Conversion						104.00	0.38%	0.39%			C
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Welding Co.						1.00	0.00%	0.00%			D
Welex Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Western Electric	139.00	6.09%	6.22%			2083.00	7.54%	7.80%			A
Westinghouse						23.00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Wilkinson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Wittronics						0.30	0.00%	0.00%			D
Woodstream Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210

\* Superseding 4/27/98 VRS

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D *De micromis* party.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Yuasa-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,934	\$29,415
De Minimis Total:	673.00	25.09%	23.48%	\$2,158,627	\$950,287	9854.37	35.69%	33.51%	\$2,795,132	\$1,219,287	\$7,123,333
Total:	2283.71	100.00%	100.00%			27608.87	100.00%	100.00%			

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B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary.

D De micromis party.

## **Attachment D**

### **Comprehensive Mailing List (All Site PRPs)**

A. Duie Pyle  
Mr. Peter Latta, President  
650 Westown Road  
West Chester, PA 19382

A.S. Koch Corporation  
c/o Syntex Dental Corporation  
c/o Heller Ehrman White & McAuliffe  
Charles M. Hungerford, Esq.  
525 University Avenue  
Palo Alto, CA 94301-1900

\*\* A I W Frank

A.S. Koch Corporation  
c/o Syntex Dental Corporation  
President  
P.O. Box 896  
Valley Forge, PA 19134

A & J Screw Machine Products  
Mr. Joseph A. Harmer  
32 Hamilton Street  
P.O. Box 278  
Chalfont, PA 18914-2804

A.S. Koch Corporation  
c/o Syntex Dental Corporation  
Mark Stevens, Esq.  
c/o Langsam, Stevens, & Morris  
1616 Walnut Street, Suite 812  
Philadelphia, PA 19103

A & J Screw Machine Products  
Mr. Joseph A. Harmer  
24 Hillside Avenue  
Chalfont, PA 18914-2804

Accumetrics  
Mr. Paul Pitcher, President  
134 Adams Street  
Royersford, PA 19468

A. Johnson & Company Incorporated  
President  
215 Welsh Pool Road  
Lionville, PA 19353

\* Accuracy Scientific

A & L Handles  
Mr. Philip K. Stonier, Vice President  
244 Shoemaker Road  
Pottstown, PA 19464

Accuracy Scientific  
c/o Accuracy Scientific Instruments  
Mr. Frank Kleine, President  
17 Piney Road  
Asheville, NC 29906

A & L Handles  
c/o Drinker, Biddle, & Reath, LLP  
Andrew Foster, Esq.  
Philadelphia National Bank Building  
1345 Chestnut Street  
Philadelphia, PA 19107-3496

Ace Service Corporation  
President  
1924 South Delaware Avenue  
Philadelphia, PA 19148

\* Address investigation currently being conducted.

\*\* Party has been identified as an orphan.



Acro Labels  
Mr. Bob Reagan, President  
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- \* Address investigation currently being conducted.
- \*\* Party has been identified as an orphan.

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